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State of Wisconsin
Governor Scott Walker

TO: **Child Care Eligibility and Authorization Workers
and Supervisors
Income Maintenance Supervisors
Income Maintenance Staff
Training Staff
Child Care Coordinators**

DECE/BELP OPERATIONS MEMO

No: 18-43

DATE: 10/16/2018

Wisconsin Shares Child Care

FROM: Kath McGurk, Director
Bureau of Early Learning and Policy
Division of Early Care and Education
Department of Children and Families

SUBJECT: Wisconsin Shares Authorization Begin and End Dates

CROSS REFERENCE: [Child Care and Development Block Grant](#);
[Wisconsin Shares Child Care Policy and Process Handbook](#),
Chapter 1: Program Eligibility and Chapter 2: Authorizations;
Operations Memos: [16-20](#), [17-37](#), [17-38](#), [17-45](#), and [18-42](#)

EFFECTIVE DATE: November 1, 2018

PURPOSE: This memo introduces the updated policy for Authorization begin and end dates in the Wisconsin Shares Child Care Subsidy Program. This memo should be read in conjunction with Operations Memo [18-42](#): Wisconsin Shares Authorization Policy.

BACKGROUND: The Child Care and Development Block Grant (CCDBG) Act of 2014 requires states to create family friendly policies that help families maintain Wisconsin Shares Child Care Subsidy and support continuity of care for children. The Bureau of Early Learning and Policy (BELP) has implemented these requirements in three phases. The first phase eliminated the Six Month Report Form (SMRF) for Wisconsin Shares Child Care and established a 12-month eligibility period (see [Operations Memo 16-20](#)). The second phase established a \$25,000 asset test for families (see [Operations Memo 17-37](#)), allows a child who reaches the age of 13 to continue receiving Wisconsin Shares up to the next annual renewal (see [Operations Memo 17-38](#)), and allows parents who experience a permanent loss of an approved activity to continue receiving Wisconsin Shares for up to three months while they search for another approved activity

(see [Operations Memo 17-45](#)). This third phase further enhances policies to promote continuity of care and reduce fluctuations in the monthly subsidy amount.

CURRENT POLICY: 2.2.3 Authorizations at Initial Eligibility

Once eligibility has been determined, an authorization may begin on the Child Care Request for Assistance (RFA) date, as long as the following requirements are met:

- The child care provider was regulated during that time.
- The child care provider had a YoungStar or Wisconsin Shares Participation Contract in place during that period of time.
- The child care provider was in compliance with fingerprint requirements during that time.
- The child care provider has a signed contract with FIS.
- If the FIS contract has not been completed, the authorization can be backdated to the RFA date after the FIS contract is complete.
- The child was attending a child care program that met all above requirements.
- The parent provided the necessary authorization assessment information within 30 days of the RFA date.

The authorization may begin on the RFA date, provider regulation date, YoungStar, or Wisconsin Shares Participation Contract date, fingerprint compliance date, or date that the child began attending the child care program, whichever of these dates is later.

Example 1: Phil applies for child care on May 15. He completes all of his eligibility requirements and his application is approved on June 8. On June 9, he provides all required approved activity schedules and information for the authorization assessment and he provides the name of the provider location that his children had started attending prior to May 15. The provider was in compliance with the requirements for Wisconsin Shares prior to the RFA date. Eligibility will begin May 1 in CWW, but the authorization in EBT CSAW will begin on May 15.

Example 2: Charlotte is receiving Wisconsin Shares for her daughter, Olivia, when she is determined to be in noncooperation with the Child Support Agency. She does not claim good cause, and her Wisconsin Shares eligibility ends on March 30. On May 8, Charlotte begins cooperating with the Child Support Agency. She reapplies for Wisconsin Shares on May 9 and is again determined eligible for Wisconsin Shares. Olivia's authorization can begin on May 9, if Olivia was attending the child care program on this date and the provider met the requirements listed in 2.2.3.

2.2.4 Authorizations for Ongoing Eligibility

If the parent provides all required information to determine eligibility (i.e. verification, interview, and signature), but does not provide the information required to complete the authorization assessment, or does not request an authorization for more than 30 days, then the authorization will only be backdated to the first of the month of the authorization request and the authorization assessment information was received.

Example 1: If a parent completes the RFA on May 5 and completes the interactive interview on May 22, signs the application summary and provides the required verification, but does not request an authorization or provide the information needed to

complete the authorization assessment until June 10, then the authorization would only be backdated to June 1.

An authorization for a case with ongoing eligibility may be backdated to the first of the month that the request was made and the authorization assessment information was provided, as long as the following requirements are met:

- The child care provider was licensed or certified during that time.
- Certification may be backdated to the certification application date, but licensing is never backdated.
- The child care provider had a YoungStar or Wisconsin Shares Participation Contract in place during the backdated period of time.
- The child care provider was in compliance with the fingerprint requirement for the backdated period of time, to be monitored by the regulatory agency.
- The child care provider (if a new provider is selected) has a signed contract with FIS.
- The child was actually attending a child care program that met all above parameters.

The authorization begin date is limited to the provider regulation date, YoungStar or Wisconsin Shares Participation Contract date, fingerprint compliance date, or the date that the child began attending the child care program, whichever is later, when any of these dates are later than the date that the authorization assessment information was received and the parent requested an authorization.

Example 2: Phil applied for child care on May 15. He is determined eligible on June 8. Eligibility will begin May 1 in CWW. He provided all of the information to complete the authorization assessment and requested an authorization on July 17. His child care provider met all Wisconsin Shares requirements prior to his request. The authorization in EBT CSAW can be backdated to July 1 or the start date of child care utilization, whichever is later.

Example 3: Phil's case was due for a child care renewal in the month of May. The renewal interview was completed on June 30, along with a signature and all required verification. Eligibility re-opened effective June 1 in CWW. Phil needs to request the authorization and provide the necessary authorization assessment information by June 30 in order to have an authorization begin date set for as far back as June 1.

If he does not request an authorization and provide the authorization assessment information by June 30, the authorization can be backdated no further than first of the month in which he requests an authorization and provides all necessary authorization assessment information, or the start date of child care utilization, whichever is later (as long as Phil chooses a provider that is already in compliance with all of the Wisconsin Shares requirements). This could be July, August, September, etc.

Example 4: Gabriel was determined to be in noncooperation with the Child Support Agency on April 10. She did not request good cause within 7 business days, and her Wisconsin Shares eligibility ended April 30. On May 10, Gabriel begins cooperating with the Child Support Agency and the noncooperation is ended. Because Gabriel is within one (1) calendar month of Wisconsin Shares eligibility ending, Gabriel's Wisconsin

Shares eligibility will reopen as of May 1 without the need to complete the interview process. Gabriel's case would be considered ongoing, and the authorization could be backdated to May 1.

NEW POLICY: The following new policy has been added to the Wisconsin Shares Policy and Process Handbook with an effective date of November 1, 2018.

2.3.6 Authorizations Begin Dates at Initial Eligibility

Once eligibility has been determined, an authorization may begin on the **latest** of the following dates:

- The Wisconsin Shares Child Care Request for Assistance (RFA) date;
- The date the child began attending a provider that met the following requirements.
 - The child care provider was regulated during that time.
 - The worker may backdate the authorization to the child care provider's certification application date as long as the certification is now complete, but the worker may never backdate the authorization to a licensed provider back to the licensing application date.
 - The child care provider had a YoungStar or Wisconsin Shares Participation Contract in place during that period of time.
- The date the parent provided all of the necessary authorization assessment information to the agency. Parents must provide all necessary authorization information to the agency within 30 days of the RFA date.
 - If the parent does not provide all of the necessary authorization assessment information within 30 days of the RFA date, the authorization will begin on the first of the month that the parent submitted all of the information to the agency, as long as the other requirements above are met.

Process: If the provider does not have a completed contract with Fidelity National Information Services (FIS), the worker will not be able to create an authorization to that provider in CSAW. If the FIS contract is not complete when all other requirements are met, the worker must backdate the authorization to the latest date in the list above once the contract is complete and entered in the FIS system. The FIS contract date is not a factor in determining the authorization Begin Date.

Example 1: Phil applies for Wisconsin Shares Child Care on May 15. He completes all of his eligibility requirements and is determined eligible on June 8. On June 24, he provides all required approved activity schedules and information for the authorization assessment and he provides the name of the provider location that his children had started attending prior to May 15. The provider was in compliance with the requirements for Wisconsin Shares prior to the RFA date. Eligibility will begin May 1 in CWW, but the authorization in CSAW will begin on June 1.

Example 2: Charlotte is receiving Wisconsin Shares for her daughter, Olivia, when she is determined to be in noncooperation with the Child Support Agency. She does not claim good cause, and her Wisconsin Shares eligibility ends on March 30. On May 8,

Charlotte begins cooperating with the Child Support Agency. She reapplies for Wisconsin Shares on May 9 and is again determined eligible for Wisconsin Shares. Olivia's authorization can begin on May 9, if Olivia was attending the child care program on this date and the provider met the requirements listed above.

2.3.7 Authorization Begin Dates During Ongoing Eligibility

An authorization for a case with ongoing eligibility may be backdated to the first of the month that the request was made and the authorization assessment information was provided, as long as the child was attending a provider who has met the following requirements:

- The child care provider was licensed or certified during that time:
 - The worker may backdate the authorization to the child care provider's certification application date as long as the certification is now complete, but the worker may never backdate the authorization to a licensed provider back to the licensing application date.
- The child care provider had a YoungStar or Wisconsin Shares Participation Contract in place during the backdated period of time.

If these requirements are not met as of the first of the month, the authorization Begin Date must be the later of the provider regulation date or the YoungStar or Wisconsin Shares Participation Contract date.

Process: If the provider does not have a completed contract with Fidelity National Information Services (FIS), the worker will not be able to create an authorization to that provider in CSAW. If the FIS contract is not complete when all other requirements are met, the worker must backdate the authorization to the latest date in the list above once the contract is complete and entered in the FIS system. The FIS contract date is not a factor in determining the authorization Begin Date.

Example 1: Phil's case was due for a Wisconsin Shares Child Care renewal in the month of May. The renewal interview was completed on June 30, along with a signature and all required verification. Eligibility re-opened effective June 1 in CWW and Phil completed his authorization assessment on July 10. The worker can backdate the authorization only to July 1 as long as Phil chooses a provider that is already in compliance with all of the Wisconsin Shares requirements.

Example 2: Gabriel was determined to be in noncooperation with the Child Support Agency on April 10. She did not request good cause within 7 business days, and her Wisconsin Shares eligibility ended April 30. On May 10, Gabriel begins cooperating with the Child Support Agency and the noncooperation is ended. Because Gabriel is within one (1) calendar month of Wisconsin Shares eligibility ending, Gabriel's Wisconsin Shares eligibility will reopen as of May 1 without the need to complete the interview process. Gabriel's case would be considered ongoing, and the authorization could be backdated to May 1.

2.3.8 Authorization End Dates

All authorizations must span to the next renewal date or to the next expected change, whichever is earlier. Shorter authorizations are temporarily allowable if needed in order

to collect sufficient schedule information from a parent with a new and varying schedule (see 2.4.3).

Expected changes include, but are not limited to:

- A change in the school year that results in a higher or lower child care need for a school-aged child for summer or fall.
- At the end date of an approved activity, such as:
 - W-2 or FSET employability plan reviews; or
 - The end of a parent's school term.
- At the end of the 24-month education time limit for eligible parents who are in Technical College or a Course of Study Leading to Employment (see 1.3.8.8).
- A change in a child care provider.
- A parent's plan to move out of state.

If there are multiple expected changes, the authorization must end on the earliest date.

If the parent indicates that they do not need an authorization, there may be an allowable gap in authorizations of a month or more during the eligibility period, as illustrated in the example below. If the parent requests a new authorization during the eligibility period after there has been a gap in authorizations, the worker may need to complete an authorization assessment (see 2.4.2).

Example: In September, Alanna completes her annual renewal. Alanna's worker writes an authorization for the school year, and asks Alanna about her child care needs for the following summer. Alanna indicates that her child, Josepha, does not need an authorization after June 15 because she will be visiting her grandparents in Florida for the summer. Alanna's worker does not write an authorization for the summer months.

Please see Operations Memo [18-42](#): Wisconsin Shares Authorization Policy for further information about Authorization policy including Consecutive Authorizations and limited exceptions.

CARES WORKER WEB (CWW) AND CSAW: There are no changes to CWW or CSAW for this policy change.

CONTACTS:

For Wisconsin Shares Child Care policy questions outside of Milwaukee County contact your Bureau of Regional Operations (BRO), Child Care Coordinators at BROCCPolicyHelpDesk@wisconsin.gov.

For Child Care CARES/CWW and CSAW Processing Questions statewide, and policy questions in Milwaukee County, contact the Child Care Subsidy and Technical Assistance line at: childcare@wisconsin.gov or (608) 422-7200.